

Before the
Federal Communications Commission
Washington, DC 20554

In the matter of

ReconRobotics Inc.,)	
Request for Waiver of Part 90 of the)	WP 08-63
Commission's Rules to Provide for)	
Limited Operations of a Public Safety)	
and Security Device at 430 ... 448 MHz)	

To: Chief, Wireless Telecommunications Bureau
Chief, Public Safety and Homeland Security Bureau

REPLY COMMENTS OPPOSING THE REQUEST FOR WAIVER

1. I am a licensed Amateur Radio Operator. My call sign is W4SW. I have operated most of the modes currently authorized for amateur operation in the 420-450 MHz amateur band, including satellite, fast scan television, voice repeater and weak signal.
2. The band is used for many different modes of operation. As others have already commented, the ReconRobot will be subjected to many types of interference, and may readily fail for this reason. Conversely, interference caused by the ReconRobot may be difficult or impossible to trace, especially if this is interference to narrow band operations such as voice repeaters or packet stations.
3. Operators of the ReconRobot may be unwilling to shut down even if they are notified they are causing interference due to the emergency nature of their operation.
4. The Channel A proposed for the ReconRobot is at frequencies heavily used by the same voice repeaters that likely would be called into operation at the time of an emergency.
5. If lower frequencies are needed to achieve building penetration and keep battery size and weight low, the system should be designed to use frequencies lower than 420 MHz. Perhaps the manufacturer could seek some type of waiver to use frequencies in the 225 to 420 MHz range instead, although many valid arguments have already been put forth that we argue against the use of a waiver in the first place.

Please deny ReconRobotics request to use the 430-450 MHz spectrum, and recommend that they redesign their system for a different frequency band.

Respectfully submitted this 2nd day of June, 2008.

Bernhard E. Keiser,
Amateur Radio License W4SW